

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

PNC BANK, N.A. COLUMBIA	§	
HOUSING SLP CORPORATION, and	§	
2013 TRAVIS OAK CREEK, LP	§	
	§	
Plaintiffs,	§	Case No. 1:17-cv-584-RP-ML
	§	
v.	§	
	§	
2013 TRAVIS OAK CREEK GP, LLC,	§	consolidated with
2013 TRAVIS OAK CREEK	§	Case No. 1:17-cv-560-RP
DEVELOPER, INC.,	§	
CHULA INVESTMENTS, LTD.,	§	
and RENE O. CAMPOS	§	
	§	
Defendants.	§	

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY IN SUPPORT
OF MOTION TO DISMISS COUNTERCLAIMS AND TO INCREASE PAGE LIMIT**

Plaintiffs PNC Bank, N.A. and Columbia Housing SLP Corporation (together, “Plaintiffs”) respectfully move for a 13-day extension of time to file a reply brief in support of their pending Motion to Dismiss All of Defendants’ Counterclaims [ECF Doc. No. 85] (the “Motion”), and request that the Court increase the page limit for the reply to 20 pages.

I. RELIEF REQUESTED

Plaintiffs request that the Court extend the deadline for Plaintiffs to file a reply brief in support of the Motion through and including November 20, 2017, and increase the page limit for a reply to 20 pages.

Plaintiffs seek this relief so that they may adequately reply to Counterclaimants’ Response [ECF Doc. No. 101]. The Response is approximately 37 pages in length, and addresses many legal issues raised in the Motion, as well as a number of issues raised for the first time in the Response. While Plaintiffs intend to respond to these arguments directly and succinctly, the

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number of causes of action at issue (nine, with numerous subsidiary claims) means that Plaintiffs will need to discuss a substantial number of distinct arguments. Therefore, Plaintiffs seek additional time and briefing space to address them.

This motion is not brought for purposes of delay, but rather so that justice may be served. Further, a brief, 13-day extension will not impact the resolution of this case.

Counsel for Plaintiffs has conferred with Kenneth Chaiken, counsel for Defendants, and he is not opposed to the relief requested in this Motion. Thus, Plaintiffs' request will not prejudice Counterclaimants.

II. CONCLUSION

For these reasons, Plaintiffs request that the Court extend their deadline to file a reply in support of the Motion through and including November 20, 2017. Further, given the extensive number of causes of action in the Counterclaim and arguments that are addressed in the Response, Plaintiffs request leave to file a reply brief not to exceed 20 pages.

Dated: November 6, 2017.

By: /s/ Robert M. Hoffman

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CERTIFICATE OF CONFERENCE

I certify that on November 3, 2017, I conferred with Kenneth Chaiken, counsel for Defendants, via email, and he indicated that Defendants are not opposed to the relief requested in this Motion.

/s/ Robert M. Hoffman _____

Robert M. Hoffman

CERTIFICATE OF SERVICE

I certify that on November 6, 2017, a copy of the foregoing document was served on all counsel of record in this case through the Court's CM/ECF facilities.

/s/ Robert M. Hoffman _____

Robert M. Hoffman